

November 30, 2017

BY HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4775 - Long-Term Contracting for Renewable Energy Recovery Factor
Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

I have enclosed ten copies of National Grid's¹ responses to the first set of data requests issued by the Rhode Island Division of Public Utilities and Carriers in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosures

cc: Docket 4673 Service List
Leo Wold, Esq.
Steve Scialabba

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

November 30, 2017
Date

Docket No. 4775 - National Grid – Long-Term Contracting for Renewable Energy Recovery Factor (Year 2018)

Service List updated 11/22/17

Name/Address	E-mail Distribution	Phone
Jennifer Brooks Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	Jennifer.hutchinson@nationalgrid.com ;	401-784-7288
	Celia.obrien@nationalgrid.com ;	
	Raquel.webster@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Corinne.Didomenico@nationalgrid.com ;	
	Stephen.McCauley@nationalgrid.com ;	
Jon Hagopian, Esq. Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	Steve.scialabba@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
Richard Hahn Daymark Energy Advisors One Washington Mall, 9 th floor Boston, MA 02108	rhahn@daymarkea.com ;	
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2017
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Linda.george@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Christopher Kearns, OER Nicholas Ucci, OER Carol Grant, Commissioner	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Carol.Grant@energy.ri.gov ;	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect January 1, 2018
Responses to Division's First Set of Data Requests
Issued on November 22, 2017

Division 1-1

Request:

Please provide all live spreadsheets, with formulae and inputs intact that were used to prepare this filing.

Response:

Please see the CD-ROM attached as Attachment DIV-1-1, which is a working Excel version of the calculations presented in the Company's filing.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect January 1, 2018
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Issued on November 22, 2017

Division 1-2

Request:

If not included in the requested spreadsheets, please provide all assumptions and calculations used to determine the forecasts of capacity revenues.

Response:

The calculation of the estimated capacity revenue for the RI LFG Genco project is below.

	26	Capacity Supply Obligation (MW)
X	7.025	2017/2018 Rest of Pool Payment Rate (\$/kW-Month)
X	5	Number of Months
X	1000	Convert kW to MW
<hr/>		
	913,250	Expected capacity revenue from ISO-NE
	26	Capacity Supply Obligation (MW)
X	11.08	2018/2019 SEMA-RI Payment Rate (\$/kW-Month)
X	1	Number of Months
X	1000	Convert kW to MW
<hr/>		
	288,080	Expected capacity revenue from ISO-NE

The total estimated capacity revenue for RI LFG Genco is \$1,201,330. The actual capacity revenue may be reduced by Peak Energy Rent adjustments. The Company does not include a reduction for Peak Energy Rent adjustments in its capacity revenue estimates.

The ISO-NE had determined that the Black Bear Orono B Hydro project was not qualified to participate in the Forward Capacity Auctions for the capacity commitment periods beginning June 2017 and June 2018 due to the Orrington-South Interface transmission constraint. Starting in June 2017, the Power Purchase Agreement requires the reduction of the monthly payment to this project by an estimated capacity payment as if the project had qualified for the Forward Capacity Auction. As described in the Power Purchase Agreement, the estimated capacity payment is calculated as if the project obtained a Capacity Supply Obligation equivalent to the Seasonal Claimed Capability.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
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Division 1-2, page 2

The following estimated capacity revenues utilize the summer and winter Seasonal Claimed Capabilities closest to the date of the Forward Capacity Auctions for 2017/2018 and 2018/2019:

	3.03	Winter Seasonal Claimed Capability (MW)
X	7.025	2017/2018 Maine Payment Rate (\$/kW-Month)
X	5	Number of Months
X	1000	Convert kW to MW
<hr/>		
	106,429	Expected capacity revenue from ISO-NE
	3.29	Summer Seasonal Claimed Capability (MW)
X	9.551	2018/2019 Rest of Pool Payment Rate (\$/kW-Month)
X	1	Number of Months
X	1000	Convert kW to MW
<hr/>		
	31,423	Expected capacity revenue from ISO-NE

The total estimated capacity revenue for Black Bear Orono B Hydro is \$137,852.

The estimated Net Forward Capacity Market Proceeds for the 19 distributed generation (DG) facilities is calculated with an estimated clearing price for the third annual reconfiguration auction for the 2018/2019 capacity commitment period. This is the same estimated clearing price that the Company used in its Proposal to Bid Capacity of Customer-Owned Distributed Generation Facilities Into the Forward Capacity Market (FCM) (Docket No. 4676). The final Net Forward Capacity Market Proceeds will be different when the auction price is established in March 2018. Also, the final Net Forward Capacity Market Proceeds for these 19 DG facilities will be impacted by the FCM's Pay-for-Performance, which commences June 2018. Below is an example of the calculation for each of these 19 DG facilities:

	X	Expected Capacity Supply Obligation (MW)
X	3.628	2018/2019 ARA3 SEMA-RI Clearing Price (\$/kW-Month)
X	1	Number of Months (June 2018)
X	1000	Convert kW to MW
<hr/>		
	\$XX	Expected capacity revenue from ISO-NE

The calculation of each DG facility's capacity revenue can be found in the Capacity Bid into FCM tab of Attachment DIV-1-1.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect January 1, 2018
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Issued on November 22, 2017

Division 1-3

Request:

Please provide the basis for the assumed capacity factor for the RI LFG Genco project. Include copies of all available documentation and communication between NGRID and the generator.

Response:

The unit factor for RI LFG Genco is calculated with its generation data for the November 2016 through October 2017 period. Please see the Company's response to Division 1-4.

The Company assumes this Data Request is for communications between the Company and Broadrock Renewables LLC (Broadrock) regarding RI LFG Genco's participation in the Forward Capacity Market. Please see Attachment DIV-1-3 which consists of two letters from Broadrock proposing to reduce its Capacity Supply Obligation (CSO) to 22 MW in upcoming future Forward Capacity Auctions and the Company's responses.

Below is a summary of the communications contained in Attachment DIV-1-3 (18 pages):

- January 30, 2017 – An email with letter from Broadrock proposing a delist bid for the capacity commitment period June 2020 to May 2021. (3 pages)
- February 2, 2017 – An email from the Company rejecting this proposal because it was not submitted 270 days prior to the bid due date as required by the Power Purchase Agreement (PPA). (2 pages)
- April 10, 2017 – An email with letter from Broadrock proposing a delist bid for the capacity commitment period June 2021 to May 2022. (3 pages)
- May 10, 2017 – An email with letter from the Company requesting Broadrock to provide any reports, data, and any other information that supports the projection of landfill gas supply. (2 pages)
- June 13, 2017 – A follow up email from the Company requesting Broadrock to provide any reports, data, and any other information that supports the projection of landfill gas supply. (2 pages)
- June 16, 2017 – An email from Broadrock acknowledging the Company's request. (3 pages)
- June 29, 2017 – An email with letter from the Company informing Broadrock that its proposal to delist to 22 MW CSO has no effect under the PPA due to Broadrock's failure to provide the Company with the information requested in the letter dated May 10, 2017. (3 pages)

Broadrock has not responded to the Company's latest communication.

Ruebenacker, James F. (Marketing)

From: Doug Wilson <dwilson@broadrock.com>
Sent: Monday, January 30, 2017 11:25 AM
To: Janzen, Margaret; Gerwatowski, Ronald T.
Cc: Ruebenacker, James F. (Marketing); Glenn Lockhart; Teri Pagano; dcrisp@drm.com
Subject: EXT || Rhode Island LFG Genco LLC (as Seller) Power Purchase Agreement Dated May 21, 2010; FCM Bid, June 2020-May 2021
Attachments: Ngrid Capacity Letter 01 30 17.pdf

All,

Please see attached.

Kind Regards,

Doug Wilson
CEO
Broadrock Renewables LLC
40 Shun Pike
Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

RHODE ISLAND LFG GENCO LLC
40 Shun Pike
Johnston, RI 02919
Phone (401) 943-8350; Fax (401) 943-0319

January 30, 2017

Margaret Janzen
Wholesale Electric Supply
National Grid
100 East Old Country Road
Hicksville, NY 11801
via email: margaret.Janzen@nationalgrid.com

Ronald T. Gerwatowski, Esq.
Deputy General Counsel
National Grid
40 Sylvan Road
Waltham, MA 02451-1120
via email: ronald.gerwatowski@us.ngrid.com

**Re: Rhode Island LFG Genco LLC (as Seller) Power Purchase Agreement Dated May 21,
2010; FCM Bid, June 2020/May 2021**

Dear Ms. Janzen,

Seller is currently preparing its submissions in connection with the Forward Capacity Auction for the 2020/21 Capacity Commitment Period as an Existing Capacity Resource and proposes to participate in this Forward Capacity Auction at 22 MW should a dynamic de-list be available due to a clearing price below the ISO-NE threshold established for this purpose. Seller has determined that this level is consistent with the Expected Capacity during this Capacity Commitment Period.

To the extent that 22 MW is less than 90% of the Seasonal Claimed Capacity, this reflects reasonable projections of the landfill gas supply available to the facility and other factors reasonably expected to impact on the output of the Facility.

Seller appreciates your consideration of this proposal.

[Signature page follows]

Rhode Island LFG Genco LLC
2020/21 Capacity Auction Proposal

Sincerely Yours,



Douglas R. Wilson
Chief Executive Officer
Rhode Island LFG Genco LLC

cc: James F. Ruebenacker (james.ruebenacker@nationalgrid.com)
Glenn Lockhart
Teri Pagano
Daniel Crisp, Esq.

Ruebenacker, James F. (Marketing)

From: Ruebenacker, James F. (Marketing)
Sent: Thursday, February 02, 2017 2:17 PM
To: Doug Wilson
Cc: Glenn Lockhart; Teri Pagano; dcrisp@drm.com; DiDomenico, Corinne; Janzen, Margaret
Subject: RE: EXT || Rhode Island LFG Genco LLC (as Seller) Power Purchase Agreement Dated May 21, 2010; FCM Bid, June 2020-May 2021

Doug,

Thank you for your January 30 letter.

We will not agree to reduce your project's capacity through a dynamic de-list bid, as proposed in that letter. As you know, Section 4.8 of the Power Purchase Agreement between National Grid and Rhode Island LFG Genco requires that you provide us with a proposal as to the amount of Capacity you will bid in a Forward Capacity Auction 270 days prior to that bid due date. The bid due date for the next Forward Capacity Auction is on Monday, February 6, one week after the date of your letter, well short of the 270 days required by the PPA. We simply don't have time to analyze and consider your proposal properly in advance of that auction.

We would be happy to discuss such a proposal for the 2018 Forward Capacity Auction if you provide that proposal to us according to the timing in the PPA, although we obviously can't commit to agree to such a proposal until we undertake the necessary analysis.

Regards,

James Ruebenacker

James Ruebenacker
Wholesale Electric Supply
[nationalgrid](#)
100 East Old Country Road
Hicksville, NY 11801
Office: (516) 545-3227
Fax: (516) 545-2464
Mobile: (917) 597-8180

From: Doug Wilson [<mailto:dwilson@broadrock.com>]
Sent: Monday, January 30, 2017 11:25 AM
To: Janzen, Margaret; Gerwatowski, Ronald T.
Cc: Ruebenacker, James F. (Marketing); Glenn Lockhart; Teri Pagano; dcrisp@drm.com
Subject: EXT || Rhode Island LFG Genco LLC (as Seller) Power Purchase Agreement Dated May 21, 2010; FCM Bid, June 2020-May 2021

All,

Please see attached.

Kind Regards,

Doug Wilson

CEO

Broadrock Renewables LLC

40 Shun Pike

Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

Ruebenacker, James F. (Marketing)

From: Doug Wilson <dwilson@broadrock.com>
Sent: Monday, April 10, 2017 8:42 AM
To: Janzen, Margaret M.
Cc: Macklin, Ronald J.; Ruebenacker, James F. (Marketing); Glenn Lockhart; Teri Pagano; Daniel Crisp
Subject: EXT || Rhode Island LFG Genco LLC PPA - 2021/22 Capacity
Attachments: NGrid Capacity Letter 04 10 17 signed.pdf

Margaret,

Please see attached letter regarding the 2021/22 capacity period.

Kind Regards,

Doug Wilson
CEO
Broadrock Renewables LLC
40 Shun Pike
Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

RHODE ISLAND LFG GENCO LLC
40 Shun Pike
Johnston, RI 02919
Phone (401) 943-8350; Fax (401) 943-0319

April 10, 2017

Margaret Janzen
Wholesale Electric Supply
National Grid
100 East Old Country Road
Hicksville, NY 11801
via email: margaret.Janzen@nationalgrid.com

Ronald J. Macklin, Esq.
Senior Vice President & General Counsel
National Grid
40 Sylvan Road
Waltham, MA 02451-1120
via email: ronald.macklin@us.ngrid.com

Re: Rhode Island LFG Genco LLC (as Seller) Power Purchase Agreement Dated May 21, 2010; FCM Bid, June 2021/May 2022

Dear Ms. Janzen,

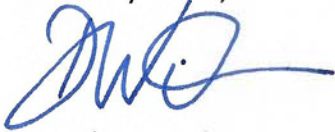
Seller is currently preparing its submissions in connection with the Forward Capacity Auction for the 2021/22 Capacity Commitment Period as an Existing Capacity Resource and proposes to participate in this Forward Capacity Auction at 22 MW and Seller and will be seeking a de-list to this level. Seller has determined that this level is consistent with the Expected Capacity during this Capacity Commitment Period.

To the extent that 22 MW is less than 90% of the Seasonal Claimed Capacity, this reflects reasonable projections of the landfill gas supply available to the facility and other factors reasonably expected to impact on the output of the Facility.

Seller appreciates your consideration of this proposal.

[Signature page follows]

Sincerely Yours,

A handwritten signature in blue ink, appearing to read 'DW', with a long horizontal flourish extending to the right.

Douglas R. Wilson
Chief Executive Officer
Rhode Island LFG Genco LLC

cc: James F. Ruebenacker (james.ruebenacker@nationalgrid.com)
Glenn Lockhart
Teri Pagano
Daniel Crisp, Esq.

Ruebenacker, James F. (Marketing)

From: Ruebenacker, James F. (Marketing)
Sent: Wednesday, May 10, 2017 11:59 AM
To: 'Doug Wilson'
Cc: Glenn Lockhart; Teri Pagano; Daniel Crisp; DiDomenico, Corinne M. (Marketing); McCauley, Stephen A. (Marketing); 'mlafratta@mcguirewoods.com'
Subject: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity
Attachments: NGrid Capacity Reply Letter 05 12 17.pdf

Doug,
Please see attached letter regarding your proposal for the 2021/22 capacity period.
Regards,
James

James Ruebenacker
Wholesale Electric Supply
[nationalgrid](#)
100 East Old Country Road
Hicksville, NY 11801
Office: (516) 545-3227
Fax: (516) 545-2464
Mobile: (917) 597-8180

From: Doug Wilson [<mailto:dwilson@broadrock.com>]
Sent: Monday, April 10, 2017 8:42 AM
To: Janzen, Margaret M.
Cc: Macklin, Ronald J.; Ruebenacker, James F. (Marketing); Glenn Lockhart; Teri Pagano; Daniel Crisp
Subject: EXT || Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Margaret,

Please see attached letter regarding the 2021/22 capacity period.

Kind Regards,

Doug Wilson
CEO
Broadrock Renewables LLC
40 Shun Pike
Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

May 10, 2017

Douglas R Wilson
Rhode Island LFG Genco LLC
40 Shun Pike
Johnston, RI 02919
via email: dwilson@broadrock.com

RE: Power Purchase Agreement (PPA) Between The Narragansett Electric Company, D/B/A National Grid (Buyer) and Rhode Island LFG Genco LLC (Seller) Dated May 21, 2010; FCM Bid, June 2021/May2022

Dear Mr. Wilson:


This letter is in response to your April 10, 2017 proposal to delist to a 22 MW Capacity Supply Obligation (CSO) in the Forward Capacity Auction (FCA) 12.

Please provide any reports, data, and any other information that supports Seller's determination that 22 MW is a reasonable projection of the facility's output during the FCA 12 Capacity Commitment Period based on projections of landfill gas supplies available and other factors that would affect that output. Once received, the Buyer will evaluate the proposal.

The Company will share the Seller's material supporting the 22 MW CSO with the Rhode Island Division of Public Utilities and Carriers. The Buyer will also provide an update on the status of the PPA, including as to the capacity obligations, to the Rhode Island Public Utilities Commission in its upcoming Long-Term Contracting for Renewable Energy Recovery Factor filing (approximately May 15, 2017) and may provide the Seller's material supporting the 22 MW CSO as part of that or a future proceeding.

Thank you for your attention to this letter. Please feel free to contact me if you have any questions concerning this matter at 516-545-5403.

Very truly yours,



Stephen A. McCauley

cc:
Mark J. LaFratta, Esq.
McGuireWoods LLP
One James Center
901 East Cary Street
Richmond, VA 23219
via email: [mjafratta@mcguirewoods.com](mailto:mjlafratta@mcguirewoods.com)

Ruebenacker, James F. (Marketing)

From: Ruebenacker, James F. (Marketing)
Sent: Tuesday, June 13, 2017 3:43 PM
To: 'Doug Wilson'
Cc: 'Glenn Lockhart'; 'Teri Pagano'; 'Daniel Crisp'; DiDomenico, Corinne M. (Marketing); Mc Cauley, Stephen A. (Marketing); 'mlafratta@mcguirewoods.com'
Subject: RE: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Good afternoon Doug.

As we requested in our letter of May 10, 2017 and so that we can evaluate your proposal to delist to a 22 MW CSO in the FCA 12, kindly provide any reports, data, and any other information to support Seller's determination that 22 MW is a reasonable projection of the facility's output during FCA 12 Capacity Commitment Period based on projections of landfill gas supplies available and other factors that would affect that output.

Please let us know if you have any questions.

Regards,

James

From: Ruebenacker, James F. (Marketing)
Sent: Wednesday, May 10, 2017 11:59 AM
To: Doug Wilson
Cc: Glenn Lockhart; Teri Pagano; Daniel Crisp; DiDomenico, Corinne M. (Marketing); Mc Cauley, Stephen A. (Marketing); mlafratta@mcguirewoods.com
Subject: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Doug,
Please see attached letter regarding your proposal for the 2021/22 capacity period.
Regards,
James

James Ruebenacker
Wholesale Electric Supply
[nationalgrid](#)
100 East Old Country Road
Hicksville, NY 11801
Office: (516) 545-3227
Fax: (516) 545-2464
Mobile: (917) 597-8180

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Subject: EXT || Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Margaret,

Please see attached letter regarding the 2021/22 capacity period.

Kind Regards,

Doug Wilson
CEO
Broadrock Renewables LLC
40 Shun Pike
Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

Ruebenacker, James F. (Marketing)

From: Doug Wilson <dwilson@broadrock.com>
Sent: Friday, June 16, 2017 12:59 PM
To: Ruebenacker, James F. (Marketing)
Cc: Glenn Lockhart; Teri Pagano; 'Daniel Crisp'; DiDomenico, Corinne M. (Marketing); Mc Cauley, Stephen A. (Marketing)
Subject: EXT || RE: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

James,

Sorry for the delay, but I've been tied up on a couple of other matters this week. I'm working up a note to address your query and should have you something in the middle of next week.

Thanks for follow-up.

Regards,

Doug Wilson
201-421-0917

From: Ruebenacker, James F. (Marketing) [<mailto:James.Ruebenacker@nationalgrid.com>]
Sent: Tuesday, June 13, 2017 3:43 PM
To: Doug Wilson <dwilson@broadrock.com>
Cc: Glenn Lockhart <GLockhart@broadrock.com>; Teri Pagano <tpagano@broadrock.com>; 'Daniel Crisp' <DCrisp@drm.com>; DiDomenico, Corinne M. (Marketing) <Corinne.DiDomenico@nationalgrid.com>; Mc Cauley, Stephen A. (Marketing) <Stephen.McCauley@nationalgrid.com>; 'mlafratta@mcguirewoods.com' <mlafratta@mcguirewoods.com>
Subject: RE: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Good afternoon Doug.

As we requested in our letter of May 10, 2017 and so that we can evaluate your proposal to delist to a 22 MW CSO in the FCA 12, kindly provide any reports, data, and any other information to support Seller's determination that 22 MW is a reasonable projection of the facility's output during FCA 12 Capacity Commitment Period based on projections of landfill gas supplies available and other factors that would affect that output.

Please let us know if you have any questions.

Regards,

James

From: Ruebenacker, James F. (Marketing)
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Subject: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Doug,
Please see attached letter regarding your proposal for the 2021/22 capacity period.
Regards,
James

James Ruebenacker
Wholesale Electric Supply
[nationalgrid](#)
100 East Old Country Road
Hicksville, NY 11801
Office: (516) 545-3227
Fax: (516) 545-2464
Mobile: (917) 597-8180

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Margaret,

Please see attached letter regarding the 2021/22 capacity period.

Kind Regards,

Doug Wilson
CEO
Broadrock Renewables LLC
40 Shun Pike
Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

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You may report the matter by contacting us via our [UK Contacts Page](#) or our [US Contacts Page](#) (accessed by clicking on the appropriate link)

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For the registered information on the UK operating companies within the National Grid group please use the attached link: <http://www.nationalgrid.com/corporate/legal/registeredoffices.htm>

Ruebenacker, James F. (Marketing)

From: Ruebenacker, James F. (Marketing)
Sent: Thursday, June 29, 2017 4:01 PM
To: Doug Wilson
Cc: Glenn Lockhart; Teri Pagano; Daniel Crisp; DiDomenico, Corinne M.; Mc Cauley, Stephen A. (Marketing); mlafratta@mcguirewoods.com; Ruebenacker, James F. (Marketing)
Subject: RE: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity
Attachments: NGrid Reply Letter 06 29 17.pdf

Doug,
Please see attached letter regarding your April 10th email.
Regards,
James

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To: 'Doug Wilson'
Cc: Glenn Lockhart; Teri Pagano; Daniel Crisp; DiDomenico, Corinne M. (Marketing); Mc Cauley, Stephen A. (Marketing); 'mlafratta@mcguirewoods.com'
Subject: Rhode Island LFG Genco LLC PPA - 2021/22 Capacity

Doug,
Please see attached letter regarding your proposal for the 2021/22 capacity period.
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James

James Ruebenacker
Wholesale Electric Supply
[nationalgrid](#)
100 East Old Country Road
Hicksville, NY 11801
Office: (516) 545-3227
Fax: (516) 545-2464
Mobile: (917) 597-8180

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Sent: Monday, April 10, 2017 8:42 AM
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Margaret,

Please see attached letter regarding the 2021/22 capacity period.

Kind Regards,

Doug Wilson

CEO

Broadrock Renewables LLC

40 Shun Pike

Johnston, RI 02919

p: (401) 943 8350 | m: (201) 421 0917 | email: dwilson@broadrock.com

June 29, 2017

Douglas R Wilson
Rhode Island LFG Genco LLC
40 Shun Pike
Johnston, RI 02919
via email: dwilson@broadrock.com

RE: Power Purchase Agreement (PPA) Between The Narragansett Electric Company, D/B/A National Grid (National Grid) and Rhode Island LFG Genco LLC (Seller) Dated May 21, 2010; FCM Bid, June 2021/May2022

Dear Mr. Wilson:

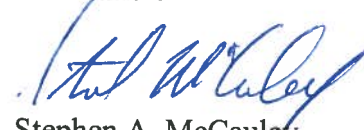
National Grid received Seller's April 10, 2017 proposal to delist to a 22 MW Capacity Supply Obligation (CSO) in the Forward Capacity Auction (FCA) 12.

On May 10, 2017, National Grid requested Seller provide any reports, data, and other information that supports Seller's determination that 22 MW is a reasonable projection of the facility's output during the FCA 12 Capacity Commitment Period based on projections of landfill gas supplies available and other factors that would affect that output. National Grid repeated its request on June 13, 2017. We have not received any of the information we requested in order to evaluate the proposal.

National Grid attempted to negotiate in good faith as provided in Section 4.8(b) of the PPA. But, in light of Seller's failure to provide us with the information needed for those negotiations within the 45-day period from our May 10 letter -- or indeed to engage in any meaningful dialogue since the April 10 letter -- the proposal to delist to a 22 MW CSO in the FCA 12 has no effect under the PPA.

Thank you for your attention to this letter. Please feel free to contact me if you have any questions concerning this matter at 516-545-5403.

Very truly yours,



Stephen A. McCauley
Authorized Signature

cc:
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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect January 1, 2018
Responses to Division's First Set of Data Requests
Issued on November 22, 2017

Division 1-4

Request:

Please provide the most recent 12 months of actual capacity factors for the RI LFG Genco project.

Response:

RI LFG Genco's nameplate capacity is 32.1 MW. Below are the unit factors for each month for the period November 2016 through October 2017.

		Hours in Maximum		Unit
Month	Generation	Month	Output	Factor
Nov-16	15,771	720	23,112	68%
Dec-16	17,539	744	23,882	73%
Jan-17	17,488	744	23,882	73%
Feb-17	15,912	672	21,571	74%
Mar-17	17,496	744	23,882	73%
Apr-17	17,094	720	23,112	74%
May-17	15,563	744	23,882	65%
Jun-17	17,596	720	23,112	76%
Jul-17	18,494	744	23,882	77%
Aug-17	16,440	744	23,882	69%
Sep-17	18,209	720	23,112	79%
Oct-17	12,718	744	23,882	53%
Annual	200,319		281,196	71%

Maximum Output = Hours in Month x Nameplate Capacity
Unit Factor = Generation / Maximum Output

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Responses to Division's First Set of Data Requests
Issued on November 22, 2017

Division 1-5

Request:

Please provide the date(s) of the futures prices that were used to determine the market energy proxy prices.

Response:

The market energy proxy prices are calculated with futures prices from November 7, 2017.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4775
In Re: Long-Term Contracting For Renewable Energy Recovery Factor
For Effect January 1, 2018
Responses to Division's First Set of Data Requests
Issued on November 22, 2017

Division 1-6

Request:

Please provide the date(s) when the REC price forecast was made.

Response:

The REC proxy price is calculated with REC broker prices from November 7, 2017.